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and Douglas Birrell
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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 CHOCOLATE MAGIC LAS VEGAS LLC, a
Delaware limited liability company,

12 Plaintiff,

13 vs.

14 BLAIR ELLIOT FORD, JR., an individual;
CINDY WIX-INGLING, an individual;
NORMAN VIDA, an individual; and ALICE
KELLEY, an individual, inclusive,

15 Defendants.

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CINDY WIX-INGLING

17 Counter-Claimant,

18 vs.

19 CHOCOLATE MAGIC LAS VEGAS LLC,
a Delaware Limited Liability Company;
DINO DICIENZO, an individual;
DOUGLAS BIRRELL, an individual;
inclusive,

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Counter-Defendants.

21 CASE NO.: 2:17-CV-00690-GMN-NJK

22 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND BRIEFING
DEADLINE RELATED TO
PLAINTIFF'S RESPONSE TO
DEFENDANT'S MOTION TO DISMISS
COMPLAINT [ECF NO. 21]**

23 **(SECOND REQUEST)**

24 Pursuant to LR6-1, the parties hereby stipulate and agree to extend the deadline for
25 Plaintiff Chocolate Magic Las Vegas, LLC to file its response to Defendant Blair Ford's Motion to
26 Dismiss Complaint (ECF No. 21), which has a current due date of May 15, 2017. This Court
27 previously granted the parties' first request, extending the deadline through May 15, 2017. (ECF
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1 No. 24.) However, since the first extension was requested, counsel for the non-movant has
2 learned that the client contact with whom he must work to prepare the evidence required by the
3 response is traveling internationally and will be unavailable in the immediate future. To allow for
4 this, the parties stipulate to an extension of time for Plaintiff Chocolate Magic Las Vegas, LLC to
5 file its response through and including May 23, 2017.

6 The foregoing request to extend a deadline is made in good faith, and is not made for the
7 purpose of delay.

8 IT IS SO STIPULATED:

9 Dated this 4th day of May, 2017.

10 LEWIS ROCA ROTHGERBER CHRISTIE LLP

12 By:/s/ John E. Bragonje

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19 Attorneys Defendant Lexon Insurance
20 Company

Dated this 4th day of May, 2017

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By:/s/ Christian Gabroy

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Attorneys Defendant Blair Elliot Ford

21 ORDER

22 IT IS SO ORDERED:

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28 UNTIED STATES DISTRICT JUDGE

DATED: May 5, 2017